

1 *[Submitting Counsel on Signature Page]*

2
3
4
5
6
7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-MD-03047-YGR

14 **JOINT STIPULATION AND ~~PROPOSED~~**
15 **ORDER REQUESTING ADDITIONAL**
16 **TIME TO FILE A JOINT STATUS REPORT**
17 **REGARDING FORENSIC IMAGING AND**
18 **DEVICE DATA**

15 This Document Relates to:

16 ALL ACTIONS
17
18
19
20
21
22
23
24
25
26
27
28

Hon. Yvonne Gonzalez Rogers
Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-1(b) and 6-2, the Parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline for Plaintiffs and Defendants provide the Court a joint status report on forensic imaging and device data from Plaintiffs' devices. The parties declare in support of this request:

1. On September 19, the Parties had an initial meeting with their respective third-party vendors to discuss the categories and location of data sought from Main Devices, and the requested format for production of the agreed upon data.

2. On September 20, 2024 the Parties submitted a Joint Status Report Regarding Forensic Imaging and Device Data to the Court. In that report, the Parties stated they would provide a supplemental report to the Court on September 27, 2024 unless the Court directs otherwise.

3. Since September 19, the Parties have continued to discuss the categories and location of data sought from Main Devices, and the requested format for production of the agreed upon data.

4. The Parties mutually agree that they would benefit from more time to continue their discussions before providing a joint status report to the Court.

5. The Parties anticipate that extension until October 2 to submit Joint Status Report Regarding Forensic Imaging and Device Data afford adequate time for such discussions.

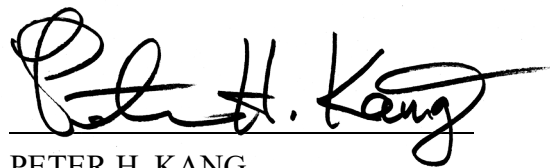
6. Extending this deadline will not affect any other deadline affixed by the Court.

7. This is the first request to extend this deadline.

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline for the parties to submit a Joint Status Report Regarding Forensic Imaging and Device Data to October 2, 2024.

IT IS SO ORDERED,

Dated: September 30, 2024



PETER H. KANG
UNITED STATES MAGISTRATE JUDGE

1 **IT IS SO STIPULATED AND AGREED.**

2
3 Dated: September 27, 2024

Respectfully submitted,

4 /s/ Lexi J. Hazam

5 LEXI J. HAZAM
6 **LIEFF CABRASER HEIMANN & BERNSTEIN, LLP**
7 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415-956-1000
lhazam@lchb.com

8 PREVIN WARREN
9 **MOTLEY RICE LLC**
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

10 Co-Lead Counsel

11
12
13 CHRISTOPHER A. SEEGER
14 **SEEGER WEISS, LLP**
55 Challenger Road, 6th floor
Ridgefield Park, NJ 07660
Telephone: 973-639-9100
Facsimile: 973-679-8656
cseeger@seegerweiss.com

15 Counsel to Co-Lead Counsel and Settlement Counsel

16
17 JENNIE LEE ANDERSON
18 **ANDRUS ANDERSON, LLP**
19 155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

20 Liaison Counsel

21
22 JOSEPH G. VANZANDT
23 **BEASLEY ALLEN CROW METHVIN PORTIS**
24 **& MILES, P.C.**
234 Commerce Street
Montgomery, AL 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

25
26 EMILY C. JEFFCOTT
27 **MORGAN & MORGAN**
28 220 W. Garden Street, 9th Floor
Pensacola, FL 32502

Telephone: 850-316-9100
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

MATTHEW BERGMAN
SOCIAL MEDIA VICTIMS LAW CENTER
821 Second Avenue, Suite 2100
Seattle, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 Broadway
New York, NY 10003
Telephone: 212-558-5500
Facsimile: 212-344-5461
jbilsborrow@weitzlux.com

PAIGE BOLDT
WATTS GUERRA LLP
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@WattsGuerra.com

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701 1100
tcartmell@wcpllp.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 Madison Ave, 7th Floor
New York, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY, PSC
2380 Grandview Drive
Ft. Mitchell, KY 41017
Telephone: 888-606-5297
semery@justicestartshere.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: (646) 666-8908
carrie@cagoldberglaw.com

1
2 RONALD E. JOHNSON, JR.
3 **HENDY JOHNSON VAUGHN EMERY, PSC**
4 600 West Main Street, Suite 100
Louisville, KY 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

5 SIN-TING MARY LIU
6 **AYLSTOCK WITKIN KREIS & OVERHOLTZ,**
7 **PLLC**
17 East Main Street, Suite 200
Pensacola, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

9 JAMES MARSH
10 **MARSH LAW FIRM PLLC**
31 Hudson Yards, 11th floor
New York, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

12 ANDRE MURA
13 **GIBBS LAW GROUP, LLP**
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

16 HILLARY NAPPI
17 **HACH & ROSE LLP**
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212.213.8311
hnappi@hrsclaw.com

19 EMMIE PAULOS
20 **LEVIN PAPANTONIO RAFFERTY**
316 South Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

23 RUTH THI RIZKALLA
24 **THE CARLSON LAW FIRM, P.C.**
1500 Rosecrans Ave., Ste. 500
Manhattan Beach, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

26 ROLAND TELLIS
27 DAVID FERNANDES
28 **BARON & BUDD, P.C.**

15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: (818) 839-2333
Facsimile: (818) 986-9698
rtellis@baronbudd.com
dfernandes@baronbudd.com

ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 Walnut Street, Suite 500
Philadelphia, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

MELISSA YEATES
JOSEPH H. MELTZER
KESSLER TOPAZ MELTZER & CHECK, LLP
280 King of Prussia Road
Radnor, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com
jmeltzer@ktmc.com

DIANDRA "FU" DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North, Suite 1500
Birmingham, Alabama 35203
Telephone: 205.855.5700
fu@dicellolevitt.com

Attorneys for Plaintiffs

FAEGRE DRINKER BIDDLE & REATH LLP

/s/ Andrea R. Pierson
Andrea Roberts Pierson, *pro hac vice*
andrea.pierson@faegredrinker.com
Amy Fiterman, *pro hac vice*
amy.fiterman@faegredrinker.com
Faegre Drinker Biddle & Reath LLP
300 N. Meridian Street, Suite 2500
Indianapolis, IN 46204
Telephone: + 1 (317) 237-0300
Facsimile: +1 (317) 237-1000

KING & SPALDING LLP

/s/ Geoffrey M. Drake
Geoffrey M. Drake, *pro hac vice*
gdrake@kslaw.com
David Mattern, *pro hac vice*
dmattern@kslaw.com
King & Spalding LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Telephone: + 1 (404) 572-4600
Facsimile: + 1 (404) 572-5100

Attorneys for Defendants
TIKTOK INC., BYTEDANCE INC., BYTEDANCE
LTD., TIKTOK LTD., and TIKTOK, LLC

ATTESTATION

I, Andrea Roberts Pierson, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the
concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: September 27, 2024

/s/ Andrea R. Pierson
Andrea Roberts Pierson

Attorneys for Defendants
TIKTOK INC., BYTEDANCE INC.,
BYTEDANCE LTD., TIKTOK LTD., and
TIKTOK, LLC